

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

TRACEY WHITE, et al.,)	
)	
Plaintiffs)	
)	
v.)	Cause No. 14-cv-01490 - HEA
)	
THOMAS JACKSON, et al.,)	
)	
Defendants.)	

**ST. LOUIS COUNTY DEFENDANTS' MEMORANDUM REGARDING JURY
INSTRUCIONS**

COME NOW Defendants Jon Belmar, Sgt. David Ryan, Officer Terence McCoy, Officer Michael McCann, Det. Derik Jackson, Det. Joseph Patterson, Det. Aaron Vinson, Det. William Bates, Det. Nicholas Payne, Officer Daniel Hill, Officer Antonio Valentine, and St. Louis County, Missouri, ("St. Louis County Defendants") and state that these defendants are submitting 160 instructions. These instructions are verdict directors, converse and affirmative defense instructions for the claims of Tracey White, William Davis Dwayne Matthews, Kerry White, Kai Bowers, Sandy Bowers, and Nathan Burns. These defendants have not yet prepared such instructions regarding Theophilus Green and Damon Coleman and Antawn Harris because it is uncertain what plaintiffs' theories are against St. Louis County and Chief Belmar because plaintiffs have not submitted instructions regarding those claims. But it is anticipated that if this Court allows plaintiffs to file instructions, that St. Louis County and Chief Belmar will submit instructions similar to what was submitted against the other plaintiffs.

The St. Louis County Defendants' verdict directors, converse and affirmative defense instructions are attached hereto.

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was delivered to all counsel of record through the Court's electronic filing system this 19th day of September, 2016.

/s/ Michael E. Hughes